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Via ECF

February 24, 2016

Hon. Henry Pitman  
United States Magistrate Judge  
United States District Court for the Southern  
District of New York  
500 Pearl Street  
New York, NY 10007

Re: ABKCO Music, Inc. et al. v. Sagan, et al., Case No. 15 Civ. 04025 (ER) (HBP)

Dear Judge Pitman,

We represent Plaintiffs/Counterclaim-Defendants and Third-Party Defendants ("Plaintiffs"). We write with reference to our letter dated January 29, 2016 (Dkt. 37) and the letter from counsel for Defendants/Counterclaimants and Third-Party Plaintiffs ("Defendants") dated February 9, 2016 (Dkt. 39). In response to our January 29 letter, Defendants agreed to produce the documents that were the subject of our letter, and to enter a stipulation governing the production and handling of confidential information in this action. The parties have conferred and agreed on the terms of a confidentiality stipulation and proposed protective order, which is being submitted to the Court via the Orders and Judgment Clerk. We respectfully ask that the Court "So Order" that stipulation and proposed order, which will facilitate the production of confidential discovery materials in this action, while protecting the parties' sensitive business information.

In light of the foregoing, the parties respectfully submit that there is no need to hold the discovery hearing currently scheduled for this coming Monday, February 29, 2016 at 10:00am.

Respectfully yours,

A handwritten signature in blue ink, appearing to read 'Tal Dickstein'.

Tal Dickstein  
Partner

cc: All counsel of record (via ECF)

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